

REMARKS

Claims 1-10, 20-25, 31, 33-37, 40, 42-50, 65-72, 78, 97-107, 114 and 116 are presented for consideration, with Claims 1, 20, 31, 33, 65, 78, 97, 114 and 116 being independent.

Initially, Applicants thank the Examiner for the courtesy extended toward their representative during the personal interview of May 16, 2006.

The interview focused primarily on Claim 33 and U.S. Patent No. 6,795,589, to Tlaskal. Proposed amendments to Claim 33 were discussed in which, among other changes, set forth that the opacity region representation and obscurance region representation are associated with the same leaf node. It was tentatively agreed that amending the claims in this manner would overcome the outstanding rejection under 35 U.S.C. §102(e), as discussed in detail below.

In that regard, all of the claims stand rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Tlaskal '589. This rejection is respectfully traversed.

Representative Claim 33 relates to a computer implemented method that includes the steps of determining an opacity region representation for each leaf node of the nodes of the expression tree and determining an obscurance region representation for at least one leaf node of the expression tree, and rendering regions of the object that are visible in the image, based on a traversal of the obscurance region representation, to create the image. As discussed above, Claim 33 has been amended to include that the opacity region representation and the obscurance region representation are associated with the same leaf node.

As discussed at the interview, Tlaskal relates to optimizing image compositing, and in doing so discloses that a compositing tree can be simplified dependent upon whether graphical objects being composited are wholly opaque, wholly transparent or otherwise. With respect to Applicants' Claim 33, however, Tlaskal fails to teach or suggest, among other features, an opacity region representation and an obscurance region representation being associated with the same leaf node, as agreed to at the interview.

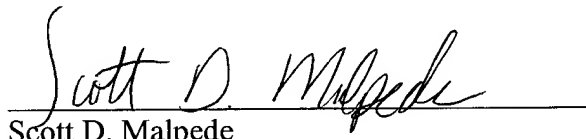
As will be appreciated, independent Claims 1, 20, 31, 65 and 78 have been amended along the same lines as Claim 33, and are thus also submitted to be patentable over Tlaskal for at least the same reasons. In Claims 97, 114 and 116, the opacity region representation and a compositing region representation are associated with the same leaf node. In that regard, a second traversal of the expression tree is performed to determine the composting region representation for each identified leaf node of the expression tree. Claims 97, 114 and 116 are thus also submitted to be patentable over Tlaskal. Accordingly, reconsideration and withdrawal of the rejection of the claims under 35 U.S.C. §102(e) is respectfully requested.

Therefore, it is submitted that Applicants' invention as set forth in independent Claims 1, 20, 31, 33, 65, 78, 97, 114 and 116 is patentable over the cited art. In addition, dependent Claims 2-10, 21-25, 34-37, 40, 42-50, 66-72 and 98-107 set forth additional features of Applicants' invention. Independent consideration of the dependent claims is respectfully requested.

In view of the foregoing, reconsideration and allowance of this application is deemed to be in order and such action is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

A handwritten signature in cursive script, reading "Scott D. Malpede", is written over a horizontal line.

Scott D. Malpede
Attorney for Applicants
Registration No. 32,533

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200

SDM/vmm

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